

**IN THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT
OF TEXAS MARSHALL DIVISION**

FRACTUS, S.A., Plaintiff, v.	JURY TRIAL DEMANDED
AT&T MOBILITY LLC, Defendant,	Case No. 2:18-cv-00135-JRG LEAD CASE
COMMSCOPE TECHNOLOGIES LLC, Intervenor-Defendant, and T-MOBILE US, INC., ET AL., Defendants.	Case No. 2:19-cv-255-JRG MEMBER CASE

**STIPULATION REGARDING USE OF VERTICAL BRIDGE CONFIDENTIAL
INFORMATION AT TRIAL**

Plaintiff Fractus, S.A. (“Fractus”) and third party Vertical Bridge REIT, LLC (“Vertical Bridge”) make the following stipulation regarding use of Vertical Bridge’s confidential information at trial:

- (1) Vertical Bridge does not object to Fractus producing the document bates numbered ATT_FRAC87979 to Defendants CommScope Technologies LLC, T-Mobile US, Inc., T-Mobile USA, Inc., and Cellco Partnership D/B/A Verizon Wireless (collectively, “Defendants”) on a HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL ONLY basis in accordance with the Protective Order issued in this case (Dkt. No. 75).
- (2) Fractus agrees that it will request that the court seal the courtroom if the document bates numbered ATT_FRAC87979, or any similar document containing Vertical Bridge’s confidential information, is discussed or entered into evidence at trial. Fractus further agrees that it will only seek to admit the document bates numbered ATT_FRAC87979, or any similar document containing Vertical Bridge’s confidential information, into evidence as a sealed exhibit.

Agreed to on behalf of Fractus, S.A.:

/s/ Michael Ng

Agreed to on behalf of Vertical Bridge REIT, LLC:

/s/ C. Mark Stratton

Dated: September 2, 2019

Respectfully submitted,

/s/ Michael Ng

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and served via the Court's electronic filing system on all counsel who have consented to electronic service on this 2nd day of September, 2019. I also certify that a copy of this filing has been provided to counsel for Vertical Bridge REIT, LLC, C. Mark Stratton, at the following email address: strattonm@gtlaw.com.

/s/ Benjamin Sauter
Benjamin Sauter